

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

**RENE CASTILLO, Individually and on  
Behalf of All Others Similarly Situated**

**PLAINTIFF**

vs.

No. 5:20-cv-1269-FB-ESC

**ISEC INCORPORATED**

**DEFENDANT**

**JOINT MOTION FOR EXTENSION OF DEADLINE TO  
FILE MOTION FOR SETTLEMENT APPROVAL**

Plaintiff Rene Castillo, individually and on behalf of all others similarly situated, and Defendant ISEC, by and through their undersigned counsel, for their Joint Status Report, the Parties state as follows:

1. On March 30, 2023, the Parties filed a Joint Advisory and Notice of Settlement informing the Court that they were in the process of finalizing a settlement agreement. ECF No. 41.
2. The Parties have drafted a settlement agreement document and are in the process of editing it to the satisfaction of all Parties.
3. Defendant's counsel was out of the country in late March and early April, which delayed the initial drafting of the agreement.
4. Accordingly, the Parties anticipate request that the deadline to file their motion for settlement approval be extended by twenty-two days, to May 22, 2023.
5. This extension is sought in good faith and not for the purpose of delay.

WHEREFORE, premises considered, Plaintiff and Defendant pray this Court grant this Motion to extend the deadline to file their motion for settlement approval to May 22, 2023.

Respectfully submitted,

**RENE CASTILLO, Individually  
And on Behalf of All Others  
Similarly Situated, PLAINTIFF**

SANFORD LAW FIRM, PLLC  
Kirkpatrick Plaza  
10800 Financial Centre Pkwy, Suite 510  
Little Rock, Arkansas 72211  
Telephone: (501) 221-0088  
Facsimile: (888) 787-2040

/s/ Josh Sanford

Josh Sanford

Tex. Bar No. 24077858

[josh@sanfordlawfirm.com](mailto:josh@sanfordlawfirm.com)

**and ISEC INCORPORATED  
DEFENDANT**

LEWIS, BRISBOIS, BISGAARD  
& SMITH, LLP  
2100 Ross Avenue, Suite 2000  
Dallas, TX 75201  
Telephone: (214) 722-7124  
Facsimile: (214) 722-7111

/s/ John M. Lynch

John M. Lynch

Tex. Bar No. 24063968

[John.lynch@lewisbrisbois.com](mailto:John.lynch@lewisbrisbois.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2023, a true and correct copy of the foregoing MOTION FOR EXTENSION was filed with the Clerk of Court via the CM/ECF system which served a copy to the following:

John M. Lynch  
Lewis, Brisbois, Bisgaard & Smith, LLP  
2100 Ross Avenue, Suite 2000  
Dallas, TX 75201  
[John.lynch@lewisbrisbois.com](mailto:John.lynch@lewisbrisbois.com)

/s/ Josh Sanford  
Josh Sanford